

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF KEVIN GANNON IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO COMPEL**

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for plaintiff, Singular Computing LLC ("Singular").

2. I submit this declaration in support of Singular's opposition to defendant Google LLC's Motion to Compel.

3. Attached as Exhibit A is a true and correct copy of excerpts from Singular's August 26, 2020 Responses to defendant Google LLC's First Set of Interrogatories.

4. Attached as Exhibit B is a "narrative" Response to Google LLC's Interrogatory No. 11.

5. Attached as Exhibit C is a true and correct copy of excerpts from the transcript of the Scheduling Conference conducted in this case on July 24, 2020 via Zoom.

6. Attached as Exhibit D is a true and correct copy of documents numbered SINGULAR-00011086; SINGULAR-00011089; SINGULAR-00011091; SINGULAR-00011099; SINGULAR-00011101.

7. Attached as Exhibit E is a true and correct copy of documents numbered SINGULAR-00009104; SINGULAR-00009110; SINGULAR-00009115; SINGULAR-00009116.

8. Attached as Exhibit F is a true and correct copy of documents numbered SINGULAR-00007143; SINGULAR-00007144; SINGULAR-00007153.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on January 28, 2021 at Boston, Massachusetts.

/s/ Kevin Gannon